

1 Matthew I. Knepper, Esq.  
2 Nevada Bar No. 12796  
3 Miles N. Clark, Esq.  
4 Nevada Bar No. 13848  
5 Shaina R. Plaksin, Esq.  
6 Nevada Bar No. 13935  
7 KNEPPER & CLARK LLC  
8 5510 So. Fort Apache Rd, Suite 30  
9 Las Vegas, NV 89148  
Phone: (702) 856-7430  
Fax: (702) 447-8048  
Email: matthew.knepper@knepperclark.com  
Email: miles.clark@knepperclark.com  
Email: shaina.plaksin@knepperclark.com

10 David H. Krieger, Esq.  
11 Nevada Bar No. 9086  
12 HAINES & KRIEGER, LLC  
13 8985 S. Eastern Ave., Suite 350  
14 Henderson, NV 89123  
Phone: (702) 880-5554  
Fax: (702) 385-5518  
Email: dkrieger@hainesandkrieger.com

15 *Attorneys for Plaintiff*

16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 SANDRA DANIEL,

19  
20 Plaintiff,

21 vs.

22  
23 WELLS FARGO HOME MORTGAGE;  
24 ONEMAIN FINANCIAL, INC.; EQUIFAX  
25 INFORMATION SERVICES LLC; and  
26 TRANS UNION LLC,

27 Defendants.

Case No.: 2:19-cv-00745-APG-CWH

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO TRANS UNION'S  
MOTION TO DISMISS**

**[FIRST REQUEST]**

28 STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO TRANS UNION'S  
MOTION TO DISMISS [FIRST REQUEST] - 1

Plaintiff Sandra Daniel ("Plaintiff"), by and through her counsel of record, and Defendant TRANS UNION LLC, ("Trans Union") have agreed and stipulated to the following:

1. On May 1, 2019, Plaintiff filed a Complaint [ECF Dkt. 1].
2. On June 14, 2019, Trans Union filed a Motion to Dismiss Complaint [ECF Dkt. 17].
3. Plaintiff's response is due on June 28, 2019.
4. Plaintiff and Trans Union, have agreed to extend Plaintiff's response deadline fourteen days in order to allow counsel to engage in settlement negotiations. As a result, both Plaintiff and Trans Union, hereby request this Court to further extend the date for Plaintiff to respond to Trans Union's Motion to Dismiss Complaint until **July 12, 2019**. This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper purpose.

IT IS SO STIPULATED.  
Dated June 27, 2019.

**KNEPPER & CLARK LLC**

/s/ Shaina R. Plaksin

Matthew I. Knepper, Esq.  
Nevada Bar No. 12796  
Miles N. Clark, Esq.  
Nevada Bar No. 13848  
Shaina R. Plaksin, Esq.  
Nevada Bar No. 13935  
5510 So. Fort Apache Rd, Suite 30  
Las Vegas, NV 89148  
Email: matthew.knepper@knepperclark.com  
Email: miles.clark@knepperclark.com  
Email: shaina.plaksin@knepperclark.com

**HAINES & KRIEGER LLC**

David H. Krieger, Esq.  
Nevada Bar No. 9086  
8985 S. Eastern Avenue, Suite 350  
Henderson, NV 89123  
Email: dkrieger@hainesandkrieger.com  
*Counsel for Plaintiff*

**ALVERSON TAYLOR & SANDERS**

/s/ Trevor Waite

Kurt R. Bonds, Esq.  
Nevada Bar No. 6228  
Trevor Waite, Esq.  
Nevada Bar No. 13779  
6605 Grand Montecito Parkway, Suite 200  
Las Vegas, NV 89149  
Email: kbonds@alversontaylor.com  
Email: twaite@alversontaylor.com

*Counsel for Defendant  
Trans Union LLC*

**IT IS SO ORDERED.**

UNITED STATES DISTRICT JUDGE  
Dated: June 27, 2019.

<p><b>CLARK HILL PLLC</b></p> <p><u>/s/ Jeremy J. Thompson</u></p> <p>Jeremy J. Thompson, Esq.  Nevada Bar No. 12503  3800 Howard Hughes Parkway, Suite 500  Las Vegas, NV 89169  Email: jthompson@clarkhill.com</p> <p><i>Counsel for Defendant  Equifax Information Services LLC</i></p>	<p><b>SNELL &amp; WILMER LLP</b></p> <p><u>/s/ Kelly H. Dove</u></p> <p>Kelly H. Dove, Esq.  Nevada Bar No. 10569  Kiah D. Beverly-Graham, Esq.  Nevada Bar No. 11916  3883 Howard Hughes Parkway, Suite 1100  Las Vegas, NV 89169  Email: kdove@swlaw.com  Email: kbeverly@swlaw.com</p> <p><i>Counsel for Defendants  Wells Fargo Bank, N.A., sued as Wells Fargo  Home Mortgage</i></p>
<p><b>BALLARD SPAHR LLP</b></p> <p><u>/s/ Joel E. Tasca</u></p> <p>Holly Priest, Esq.  Nevada Bar No. 13226  Joel E. Tasca, Esq.  Nevada Bar No. 14124  One Summerlin  1980 Festival Plaza Drive, Suite 900  Las Vegas, NV 89135  Email: priesth@ballardspahr.com</p> <p><i>Counsel for Defendant  Onemain Financial, Inc.</i></p>	<p>.</p>

**ORDER GRANTING**  
**STIPULATION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO**  
**TRANS UNION'S MOTION TO DISMISS**

**IT IS SO ORDERED.**

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

Dated: \_\_\_\_\_